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November 6, 2014

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Via ECF and Hand Delivery

Hon. Lewis A. Kaplan
United States District Judge
500 Pearl Street
New York, NY 10007

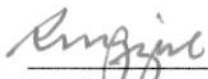
Re: *In re BNYM Corp. Foreign Exchange Transactions Litigation*, No. 12 MD 2335;
United States v. BNYM, No. 11 CV 6969

Dear Judge Kaplan:

The Bank of New York Mellon (“BNYM”) and David Nichols (collectively, “Defendants”) hereby respond to the Court’s November 5, 2014 order. Attachment A to this letter is Defendants’ proffer of relevance for each of the 22 depositions mentioned in Plaintiffs’ November 3, 2014 letter (USAO Dkt. No. 131), limited to one brief paragraph per deposition.

We thank the Court for the opportunity to make this submission.

Respectfully submitted,



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Enclosure